

1 Todd C. Ringstad (State Bar No. 97345)
2 todd@ringstadlaw.com
3 RINGSTAD & SANDERS LLP
4 23101 Lake Center Drive, Suite 355
5 Lake Forest, CA 92630
6 Telephone: 949-851-7450
7 Facsimile: 949-851-6926

5 || Counsel for Defendant Esther Kim

6 Joseph Rothberg (SBN 286363)
7 LEVENE, NEALE, BENDER, YOO &
GOLUBCHIK L.L.P.
8 2818 La Cienega Avenue
9 Los Angeles, California 90034
Telephone: (310) 229-1234
Email: jmr@lnbyg.com

10 || Attorneys for Plaintiff, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re
INTERWORKS UNLIMITED INC.,
Debtor.

17 EDWARD M. WOLKOWITZ, Chapter 7
18 Trustee for the Estate of Interworks
Unlimited Inc..

Plaintiff.

VS.

ESTHER KIM,

Defendant.

Case No. 2:19-bk-17990-VZ

Adv. No. 2:21-ap-01146-VZ

Chapter 7

**STIPULATION TO EXTEND DEADLINES
AND CONTINUE PRE-TRIAL CONFERENCE**

Current Pre-Trial Conference:

Date: January 22, 2026

Time: 11:00 a.m.

Place: Courtroom 1368
255 E. Temple Street
Los Angeles, California 90012

Proposed Continued Pre-Trial Conference:

Date: August 20, 2026

Time: 11:00 a.m.

Place: Courtroom 1368
255 E. Temple Street
Los Angeles, California 90012

1 **TO THE HONORABLE VINCENT P. ZURZOLO, UNITED STATES**
2 **BANKRUPTCY JUDGE:**

3 This Stipulation to Extend Deadlines and Continue Pre-Trial Conference is entered into by
4 and between Plaintiff Edward M. Wolkowitz, the duly-appointed and acting Chapter 7 Trustee
5 ("Plaintiff") for the bankruptcy estate of Interworks Unlimited, Inc. ("Debtor"), through his
6 counsel, Levene Neale, Bender, Yoo & Golubchik L.L.P., and Defendant Esther Kim
7 ("Defendant"), through her counsel, Ringstad & Sanders LLP ("Counsel"), with reference to the
8 following facts and recitals:

9 **RECITALS**

10 A. On July 9, 2019, the Debtor filed a petition for relief under Chapter 7 of Title 11 of
11 the United States Code.

12 B. On July 9, 2021, Plaintiff filed a complaint against Defendant for breach of
13 contract, unjust enrichment, avoidance and recovery of voidable transactions, and recovery of
14 preference ("Complaint"), commencing the above-captioned adversary proceeding ("Adversary
15 Proceeding").

16 C. On February 3, 2022, as Dk. No. 28, Plaintiff filed his First Amended Complaint
17 for (1) Unjust Enrichment and (2) the Avoidance and Recovery of Certain Transfers ("Amended
18 Complaint").

19 D. On March 24, 2022, as Dk. No. 37, the Defendant filed her Answer to the
20 Complaint ("Answer").

21 E. On June 10, 2022, as Dk. No. 46, the Defendant filed an Amended Answer.

22 F. On April 11, 2023, as Dk. No. 50, the Court entered an amended scheduling order
23 listing the following deadlines:

- 24 a. All discovery must be completed by June 9, 2023, including receipt of
25 written responses to discovery requests and filing of all expert reports
26 and supporting declarations;
- 27 b. The last date to join parties and amend pleadings is August 24, 2023;
- 28 c. The last date for pre-trial motions to be heard is August 24, 2023

except for a motion to approve a settlement or a motion to exclude evidence at trial;

- d. A Pre-Trial Conference is set for October 26, 2023, at 11:00 a.m., at which a date for trial may be set; and
 - e. No later than October 12, 2023, the parties must file and serve a Pre-Trial stipulation.

G. The Parties thereafter exchanged documents and information in support of their respective positions and are negotiating to reach a consensual resolution to this Adversary Proceeding.

H. The Court previously approved a stipulation between the parties, moving the discovery cut off to June 9, 2023, and the Pre-Trial Conference to October 26, 2023.

I. Thereafter, in June 2023, the parties entered into another stipulation first on June 20, 2023, to continue the litigation deadlines and trial date (Dk. No. 52). The Parties agreed that entering into such stipulation would greatly advance substantive settlement discussions, especially as the Parties' respective counsel continued to negotiate concerning other adversary proceedings in this bankruptcy where the Parties' same counsel are also involved.

J. The Court approved the stipulation (Dkt. No. 55) and set the following new deadlines:

- a. All discovery must be completed by October 9, 2023, including receipt of written responses to discovery requests and filing of all expert reports and supporting declarations;
 - b. The last date to join parties and amend pleadings is December 21, 2023;
 - c. The last date for pre-trial motions to be heard is December 21, 2023 except for a motion to approve a settlement or a motion to exclude evidence at trial; and
 - d. A Pre-Trial Conference is set for February 29, 2023, at 11:00 a.m. (subsequently modified), at which a date for trial may be set.

1 K. Thereafter, the Parties have engaged in significant and substantive settlement
2 discussions. The Parties once again agreed to continue the extend the litigation deadlines given
3 the depth of the continuing settlement discussions. The Parties agreed to extend those deadlines
4 by stipulation (Dk. No. 58), which was approved by the Court on October 19, 2023 (Dk. No. 61).

5 L. By the Spring of 2024, the Parties had reached a tentative agreement to settle the
6 case. The settlement was predicated on payments to be made to the estate, to be made over the
7 course of twenty-four months.

8 M. On July 12, 2024, the Trustee filed a Notice of Settlement (Dk. No. 64).

9 N. Based on the Notice of Settlement and after discussion of the structure of the
10 settlement on the record, the Court continued to the Pre-Trial Conference from August 15, 2024
11 to December 18, 2025 (Dk. No. 65).

12 O. The Court, on its own motion, then continued the Pre-Trial Conference again
13 From December 18, 2025 to January 22, 2026 (Dk. No. 67).

14 P. The Parties are still performing under the settlement agreement which they
15 entered into. They expect to have completed their settlement over the summer of 2026. Thus, the
16 Parties request that the Court continue the Pre-Trial Conference to August 20, 2026, in order to
17 allow the settlement to be completed.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

STIPULATION

NOW THEREFORE, the Parties stipulate and agree as follows:

1. The January 22, 2026 Pre-Trial Conference should be continued to August 20, 2026, at 11:00 a.m., or to a date thereafter that is convenient to the Court.

2. Plaintiff and Defendant reserve all rights with respect to the Adversary Proceeding.

IT IS SO STIPULATED.

RINGSTAD & SANDERS LLP

Dated: December 2, 2025

By: Todd Ringstad
Todd Ringstad
Counsel for Defendant Esther Kim

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

Dated: December 2 , 2025

By: Joseph M. Rothberg
Joseph M. Rothberg
Counsel for Plaintiff Edward M. Wolkowitz,
Chapter 7 Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation To Extend Deadlines And Continue Pre-Trial Conference** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **December 3, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Todd M Arnold tma@lnbyg.com
- Kurt Ramlo RamloLegal@gmail.com, kr@ecf.courtdrive.com, ramlo@recap.email
- Todd C. Ringstad becky@ringstadlaw.com, arlene@ringstadlaw.com
- Joseph M Rothberg jmr@lnbyg.com, jmr.LNBYG@ecf.inforuptcy.com
- Ashley M Teesdale ateesdale@bg.law, ecf@bg.law
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Edward M Wolkowitz emw@lnbyg.com

2. SERVED BY UNITED STATES MAIL: On (*date*) **December 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **December 3, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 3, 2025
Date

Rebecka Merritt
Printed Name

/s/ Rebecka Merritt
Signature